

EXHIBIT F

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF TENNESSEE
3 NASHVILLE DIVISION

4 CHRISTIE ANDREWS,)

5 Plaintiff,)

6 vs.)

7 TRI STAR SPORTS AND)
8 ENTERTAINMENT GROUP, INC.,)

9 Defendant.)
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CASE NO.
3:21-cv-00526

14 VIDEOTAPED DEPOSITION OF:

15 PEGGY STEPHENS

16 Taken on behalf of the Plaintiff

17 August 24, 2022
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1 APPEARANCES:

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13 Also Present:

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1 assisting the teams with meeting job deliverables.

2 Q. Okay. Explain. Expand upon
3 that, please.

4 A. So kind of like the title
5 indicates, the team coordinator, they would really
6 project manage the team insofar as managing the
7 deliverables and en- -- and ensuring that if a
8 client e-mail came in or if a trusted advisor
9 e-mailed, was there a response to the e-mail. It
10 was their job to go: Did someone respond? Not
11 that they were responsible for the response. It
12 was their responsibility to ensure a response was
13 given.

14 Q. Okay. How else did they help the
15 team manage the projects?

16 A. We have trackers. We have
17 checklists. And the team coordinators are
18 responsible for ensuring checklists are completed,
19 that the tracker's set up to track open items for
20 the clients, would be completed in a timely
21 manner.

22 Q. And what's the name of that
23 system?

24 A. Teams.

25 Q. I'm sorry?

1 Q. Was it within your scope of
2 authority to tell Mr. Luecke to discipline Ms.
3 Andrews for excessive tardiness?

4 A. We had regular conversations with
5 Ms. Andrews.

6 Q. And you guys went through the
7 formal disciplinary process at the times?

8 A. We would have verbal and we would
9 do it in e-mail, which was written. Did we
10 formally write her up? I know that I participated
11 in a couple of write-ups for her tardiness. Did
12 we ever take it as far as to fire her? No, we did
13 not.

14 Q. Did you -- did you consider the
15 -- the adjustment to her schedule to be a
16 reasonable accommodation under the AD- -- ADA?

17 A. Yes.

18 Q. Okay. Did you see a Reasonable
19 Accommodation form completed for that?

20 A. We had -- yes. I mean, it wasn't
21 a specific ADA form. Did we have a form that
22 changed her hours of -- in the office? Yes, that
23 was a form that we completed, and we made a change
24 to it to accommodate her.

25 Q. And when did you first learn that

1 Ms. Andrews was going to be terminated?

2 A. As part of the RIF?

3 Q. Uh-huh.

4 A. I found out when everyone else
5 found out.

6 Q. So it was announced that: We're
7 terminating Ms. Andrews?

8 A. No. It was after -- after the
9 RIF happened. There was no foreknowledge to
10 anyone. It was between Lou, and that was really,
11 like, HR for making any sort of payroll
12 adjustments under California law.

13 Q. Why under California law?

14 A. Because California law, if you
15 RIF somebody, you have to pay them same day. So
16 the payroll has to be processed.

17 Q. But I thought Andrews -- but
18 you're not specifically addressing Andrews?
19 You're just talking about the RIF that impacted a
20 couple --

21 A. Well, because it was a group of
22 people. It wasn't just one person.

23 Q. It's been a long day. Have we
24 introduced a document under the Protective Order
25 113 yet? Is that....

1 left, did you have a conversation with her?

2 A. I did not.

3 Q. You worked for her -- with her
4 for at least seven years; is that fair?

5 A. That is fair.

6 Q. And you didn't send her, like --
7 or say: It was nice working with you, or anything
8 like that?

9 A. I did not.

10 Q. Would you consider Ms. Andrews
11 for rehire?

12 A. I would not.

13 Q. Why not?

14 A. The -- the difficulty in every,
15 single day work with Christie was too difficult to
16 want to rehire her. It was problematic. It was
17 hard.

18 Q. Can you be more specific for me?

19 A. She was not a good employee,
20 because she was unreliable, undependable for her
21 team. We need people who are dependable.

22 Q. Okay. Any other reasons you
23 wouldn't consider her for employment?

24 A. No.

25 Q. Okay. And have you ever seen a